

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CCM PATHFINDER POMPANO BAY, LLC,	:	
	:	INDEX NO. 08 CIV 5258
Plaintiff,	:	INDEX NO. 08 CIV 5297
	:	INDEX NO. 08 CIV 5298
-against-	:	
COMPASS FINANCIAL PARTNERS LLC	:	<u>DECLARATION OF SELBY JESSUP IN</u>
and COMPASS USA SPE LLC,	:	<u>SUPPORT OF PLAINTIFFS' MOTION</u>
	:	<u>FOR REMAND</u>
Defendant.	:	
-----	:	
AND RELATED ACTIONS	:	
-----	X	

I, Selby Jessup, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a paralegal with DLA Piper US LLP, counsel of record for plaintiffs CCM Pathfinder Pompano Bay, LLC and CCM Pathfinder Gramercy, LLC ("Plaintiffs"). I have personal knowledge of the facts set forth herein and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as Exhibit "A" is a true and correct copy of the Application for Foreign Limited Liability Company for Authorization to Transact Business in Florida ("Application"), which I downloaded from the Florida Secretary of State website. According to the Application, the managing member or manager of Compass Financial Partners LLC is Compass Partners LLC.

3. Attached hereto as Exhibit "B" is a true and correct copy of the screenshots of Compass Partners' website at www.compass-partners.net. According to the screenshots, Mr. David Blatt is "a Founder and Partner of Compass Partners LLC," and Compass Partners LLC is

located at 333 Seventh Avenue, Third Floor, New York, NY 10001. Compass Partners' website further states that:

Mr. Blatt earned his Bachelors in Business Management from Yeshiva University, JD from Cardozo School of Law, MBA from Zicklin School of Business, Baruch College, and his Masters in Negotiation & Dispute Resolution from Pepperdine University School of Law. He is licensed to practice law in New York, New Jersey and California.

4. Based on the information that Mr. Blatt attended Cardozo School of Law and is licensed to practice law in New York, I accessed Mr. Blatt's records in New York State Unified Court System website at <http://iapps.courts.state.ny.us/attorney/AttorneySearch>, which identified Mr. Blatt's telephone number as (212) 677-5740. A true and correct copy of the screenshot from the New York State Unified Court System website is attached hereto as Exhibit "C." I searched the LEXIS database using Mr. Blatt's name as a search term and narrowing the results using the telephone number and found that Mr. Blatt's residence is located on Grand Street in New York, New York. A true and correct copy of the redacted LEXIS report is attached hereto as Exhibit "D." I have redacted the address number and other information in the LEXIS report out of consideration for Mr. Blatt's privacy. I am prepared to submit an unredacted report if directed by the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 20th day of June 2008 in Los Angeles, California.

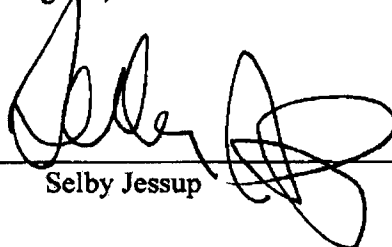


Selby Jessup

Exhibit A

**APPLICATION BY FOREIGN LIMITED LIABILITY COMPANY FOR AUTHORIZATION TO
TRANSACT BUSINESS IN FLORIDA**

*IN COMPLIANCE WITH SECTION 608.503, FLORIDA STATUTES, THE FOLLOWING IS SUBMITTED TO REGISTER A FOREIGN
LIMITED LIABILITY COMPANY TO TRANSACT BUSINESS IN THE STATE OF FLORIDA:*

1. COMPASS FINANCIAL PARTNERS LLC
(Name of Foreign Limited Liability Company)
2. Delaware
(Jurisdiction under the law of which foreign limited liability company is organized)
3. _____
(FEI number, if applicable)
4. April 19, 2007
(Date of Organization)
5. _____
(Duration: Year limited liability company will cease to exist or "perpetual")
6. _____
(Date first transacted business in Florida, if prior to registration.)
(See sections 608.501 & 608.502 F.S. to determine penalty liability)
7. 333 7th Avenue, 3rd floor
New York, NY 10001
(Street Address of Principal Office)
8. If limited liability company is a manager-managed company, check here ☐
9. The name and usual business addresses of the managing members or managers are as follows:
Compass Partners LLC
333 7th Avenue, 3rd floor
New York, NY 10001
10. Attached is an original certificate of existence, no more than 90 days old, duly authenticated by the official having custody of records in the jurisdiction under the law of which it is organized. (A photocopy is not acceptable. If the certificate is in a foreign language, a translation of the certificate under oath of the translator must be submitted.)
11. Nature of business or purposes to be conducted or promoted in Florida: mortgage servicing


Signature of a member or an authorized representative of a member.
(In accordance with section 608.408(3), F.S., the execution of this document constitutes an affirmation under the penalties of perjury that the facts stated herein are true.)

Caroline Quigley/authorized person

Typed or printed name of signee

FILED
2007 JUN 11 P 3:52
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

Exhibit B



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333 SEVENTH AVENUE
THIRD FLOOR
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OUR TEAM

DAVID BLATT, Esq. MBA, MA is a Founder and Partner of Compass Partners LLC. Mr. Blatt has six years experience of acquiring and asset managing financially and environmentally distressed real estate and mortgages. Prior to founding Compass Partners LLC, Mr. Blatt ran a private equity firm for three years that focused on acquiring investment real estate in the Northeast Region. Prior to that he worked for three years as an acquisitions and asset manager at Flatiron Real Estate Advisors, LLC, a real estate acquisitions firm of environmentally and financially distressed assets.

Mr. Blatt earned his Bachelors in Business Management from Yeshiva University, JD from Cardozo School of Law, MBA from Zicklin School of Business, Baruch College, and his Masters in Negotiation & Dispute Resolution from Pepperdine University School of Law. He is licensed to practice law in New York, New Jersey and California.

BORIS PISKUN is a Founder and Partner of Compass Partners LLC. Prior to founding Compass Partners LLC, Mr. Piskun was a founding principal of The Sunset Group LLC (TSG), a tax lien and distressed mortgage acquisition firm. While at TSG, he acquired those assets for over four years delivering outstanding returns to the company and its investors. Prior to founding The Sunset Group LLC, Mr. Piskun worked for four years as a trader at SG Cowens Syndicated Loan Sales and Trading desk.

Mr. Piskun earned his Bachelors in History from Columbia University and holds Series 7, 55, and 63 securities licenses. Upon completing Columbia, Mr. Piskun was drafted to play professional basketball overseas for Maccabi Raanana of the Israeli First Division. During his tenure, the team competed for the Israeli Championship title two years in a row, as well as competed in the FIBA EuroCup against the top teams in Europe.

Cade Liu is a Senior Associate with Compass Partners LLC. Prior to joining Compass Partners, Mr. Liu worked as a Transaction Manager in the Real Estate Finance Group at CIBC World Markets, where he underwrote and closed \$170 million of CMBS transactions, including first mortgages, B-notes, and mezzanine loans.

Mr. Liu earned his BS in Civil Engineering from Duke University and his MBA from Columbia Business School.

Exhibit C

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Attorney Detail

as of 06/20/2008

Registration Number: 4079786

DAVID BLATT

BLATT HOLDINGS, LLC

333 7TH AVE FL 3RD

NEW YORK, NY 10001-5004

United States

(212) 677-5740

Year Admitted in NY: 2002

Appellate Division

Department of

Admission: 1

Law School: BENJAMIN N. CARDOZO

Registration Status: Currently registered

Next Registration: Apr 2010

The Detail Report above contains information that has been provided by the attorney listed, with the exception of REGISTRATION STATUS, which is generated from the OCA database. Every effort is made to insure the information in the database is accurate and up-to-date.

The good standing of an attorney and/or any information regarding disciplinary actions must be confirmed with the appropriate Appellate Division Department. Information on how to contact the **Appellate Divisions** of the Supreme Court in New York is available at www.nycourts.gov/courts.

If the name of the attorney you are searching for does not appear, please try again with a different spelling. In addition, please be advised that attorneys listed in this database are listed by the name that corresponds to their name in the Appellate Division Admissions file. There are attorneys who currently use a name that differs from the name under which they were admitted. If you need additional information, please contact the NYS Office of Court Administration, Attorney Registration Unit at 212-428-2800.

Exhibit D

DPPA - 1. Litigation

GLBA - 1. Fraud Prevention or Detection

Phone

This data is for informational purposes only.

Name:	BLATT, DAVID
Address:	GRAND ST NEW YORK, NY 10002
Phone:	(212) 677-5740